

**ALLTEL Communications, Inc.**  
**E-911**  
**Thirteenth Quarterly Report**  
**November 1, 2005**  
**CC Docket No. 94-102**

**Introduction**

Alltel Communications, Inc. ("Alltel") is a cellular and PCS provider subject to the Phase II deployment requirements for Tier II carriers as contained in the Commission's Order to Stay, CC Docket No. 94-102, 17 FCC Rcd 14841 (2002) ("Stay Order"). Alltel has chosen an AGPS handset-based location technology to comply with the Phase II E-911 requirements. Alltel has exceeded each of the handset deployment thresholds set under the terms of the Stay Order, as has been reported to the Commission in previous quarterly reports.

Alltel is also required to begin delivering Phase II enhanced service to PSAPs by the later of six months of a bona fide PSAP request or March 1, 2003. Alltel is implementing Phase I and Phase II service to PSAPs in accord with the activation timetables negotiated with the PSAPs and has an exemplary record both for the timeliness and quality of its Phase I and Phase II activations.

This report is submitted pursuant to ¶¶ 28-31 of the Stay Order, and in accordance with the procedures established by Public Notice, Wireless Telecommunications Bureau Standardizes Reporting on Wireless E-911 Implementation, DA 03-1902 (released June 6, 2003). The spreadsheet required under the Public Notice is attached hereto.

Alltel has continued to actively engage the PSAPs within its market areas to ensure timely deployment of both Phase I and Phase II E-911 service in keeping with the status and readiness of the particular PSAP, the availability of vendor equipment and LEC upgrades, as well as the Commission's deadlines for Phase II E-911 under the Stay Order.

Finally, on July 11, 2005, the Commission approved the transfer of control of Western Wireless Corporation to Alltel Corporation. The parties consummated the transaction effective 12:01 AM on August 1, 2005.<sup>1</sup> The information contained herein for the first time relates to "post-merger" Alltel, and incorporates information for the merged company as a whole.

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<sup>1</sup> See *Applications of Western Wireless Corporation and Alltel Corporation*, Memorandum Opinion and Order, WT Docket No. 05-50, FCC 05-138 (rel. July 19, 2005).

## **Discussion**

### **I. Phase II AGPS Network Deployments**

As previously reported, Alltel has completed switch upgrades, deployment and testing of redundant MPC/PDEs, and has implemented redundant trunking between these units. Alltel has configured its system consistent with the standard E-2 interface and has completed testing. As previously advised, further real-world testing of the MPC/PDE is necessary on a PSAP-by-PSAP basis to ensure end-to-end functionality. Alltel engages in such testing with capable PSAPs prior to cutting to live service. Alltel recently acquired GSM/TDMA-based systems from Public Service Cellular and Cingular (as a consequence of the divestiture requirements associated with the Cingular/AT&T Wireless merger). Alltel has deployed CDMA overlays in these markets and has established timetables with Commission staff to facilitate Phase II compliance via Alltel's existing Phase II AGPS handset-based technology solution as reported in previous reports. Alltel also obtained in the Western Wireless transaction four TDMA markets, one of which is subject to a recent request for Phase II service. Alltel intends to convert each of these markets to CDMA technology and incorporate them into Alltel's company-wide A-GPS based handset solution. Alltel intends to submit its plan for conversion in the immediate future and will seek any latitude required under the rules pursuant to a focused, short-term waiver request.

### **II. Handset Deployment**

Alltel began deploying and activating its first ALI capable handsets in its markets on June 30, 2002 well in advance of the required March 1, 2003 date. It exceeded the May 31, 2003 handset deployment threshold (25% of new activations) with AGPS equipped handsets comprising approximately 30.3% of new handset activations as of that date. It also exceeded the November 30, 2003 threshold (50% of new activations) with AGPS equipped handsets comprising approximately 98% of new handset activations as of that date. Alltel has substantially complied with the May 31, 2004 threshold requirement that 100% of all new digital handset activations must be ALI-capable.<sup>2</sup> In anticipation of the December 2005 requirement, Alltel continues its internal review of handset activations on a granular ESN by ESN basis with the assistance of its vendors to ensure that all location capable handsets are tracked accurately throughout Alltel's distribution system.

Given the now documented pace of customer migration to ALI-capable handsets and forecasted churn, Alltel has concluded that it will not meet the Commission's 95% AGPS handset penetration requirement by December 31, 2005. The Company filed a limited waiver request for the merged Alltel/Western company with the Commission on September 30, 2005 that includes a detailed explanation of its good faith compliance efforts to date, extensive

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<sup>2</sup> As reported previously, an Alltel internal review revealed isolated activations of some customer-owned and other non-ALI-capable handsets, contrary to established Alltel policy governing the activation of such handsets. Corrective action has been undertaken to ensure that this policy is adhered to in the future.

documentation on the slow down in existing customers' migration to A-GPS handsets, and the Company's expected "path to full compliance."<sup>3</sup> As discussed in more detail in the Petition, ALI capable handset deployment levels for Alltel's current subscriber base stand at 79% as of August 31, 2005. Based upon current trends and projections, Alltel anticipates that ALI capable handsets will be deployed to approximately 85.0% of its post-merger subscriber base as of December 31, 2005, and could take until June 30, 2007 to reach the 95% penetration level. Alltel is continuously monitoring its number of activated ALI-capable handsets and will continue its ongoing efforts directed toward augmenting ALI capable handset penetration, including consideration of the attributes of those subscribers with non-ALI capable handsets.

The following is a summary list of AGPS-enabled handsets distributed by Alltel and their launch dates:

Vendor	Launch Date	Vendor	Launch Date
Audiovox 9155	June 2002	LG VX3100	February 2004
Kyocera 2325	October 2002	Kyocera KX434	March 2004
Motorola 120e	October 2002	Kyocera SE44	June 2004
Kyocera 7135	November 2002	Nokia 3587I	July 2004
Toshiba CDM9500	November 2002	LG 5550	August 2004
Kyocera 3225	March 2003	Audiovox 8910	November 2004
Motorola T720	February 2003	Motorola V710	November 2004
Nokia 3585I	July 2003	LG 3200	November 2004
Motorola V60x	September 2003	Motorola V262	December 2004
LG 5450	December 2003	Motorola V265	March 2005
Kyocera 3250	January 2004	LG 4750	March 2005
Audiovox 8410	January 2004	Kyocera KX440	March 2005
		Kyocera KX1	April 2005
		Blackberry 7250	April 2005
		Nokia 6255I	June 2005
		Kyocera Blade	June 2005
		LG AX5000	August 2005
		Samsung n330	September 2005

### III. Accuracy Requirements and Methodology

Alltel's extensive testing and evaluation processes were reported and detailed in its earlier Quarterly Reports. Alltel has transitioned from testing and evaluating its AGPS solution, which Alltel believes is compliant with the Commission's rules and consistent with OET Bulletin 71, to real-world deployment of its technology in response

<sup>3</sup> See Alltel Corporation Petition for Limited Waiver, filed Sept. 30, 2005 in CC Docket No. 94-102 (the "Petition"); Public Notice, *Wireless Telecommunications Bureau Requests Comment on Alltel Petition for Limited Waiver of the December 31, 2005 Deadline to Achieve Ninety-Five Percent Penetration of Location-Capable Handsets Among Its Subscribers*, WT Docket No. 05-287, DA 05-2675 (rel. Oct. 7, 2005).

to valid PSAP requests. Alltel has contracted with WFI and Marconi for calibration and functional testing for deployment to capable PSAPs. Alltel has separately contracted with TechnoCom to engage in accuracy testing in accordance with OET Bulletin 71. In all markets in which PSAPs have requested service, Alltel is capable of transmitting Phase II-compliant ALI to the PSAP for all of its MSC vendors – Lucent, Nortel and Motorola. As discussed below, additional testing is required as individual PSAPs complete their own upgrades and deployment proceeds on a PSAP by PSAP basis. Finally, Alltel continues to test new ALI-capable handsets prior to their acceptance into its product line to establish benchmarks for Phase II location accuracy.

#### **IV Deployment Issues**

As previously reported, Alltel has encountered the same PSAP, vendor and LEC issues as well as the technology hurdles normally experienced with the initial deployment of a maturing technology. These issues have arisen in both the Phase I and Phase II contexts. Alltel's experience indicates that, in most markets, problems are resolved in a timely manner and subject to mutually agreed upon deployment schedules for Phase II so that service to the PSAPs is not adversely affected.

Regarding those networks Alltel has acquired through acquisition, Alltel has converted, or will convert, these GSM/TDMA networks to CDMA and, consequently, Alltel's handset-based E-911 Phase II solution, to provide Phase II service in response to valid PSAP requests. Where PSAPs in these markets are currently providing Phase II service, Alltel has made arrangements to continue the existing network-based solution to provide continuous E-911 Phase II services until the CDMA conversion is complete, and the GSM/TDMA platforms are discontinued. Alltel continues to work hand-in-hand with the PSAPs in these markets to ensure timely deployment according to the negotiated dates.

#### **V. Status of Phase I and Phase II Deployment Efforts.**

Alltel continues to strive for early E-911 deployment. Additional markets are moving rapidly toward live Phase II deployment. Detailed spreadsheets on both Phase I and Phase II deployment schedules are attached to this filing. Alltel would be pleased to provide the Commission with such additional information as it may require.

##### **A. Phase I**

Alltel has received 1,281 Phase I PSAP requests as of October 15, 2005 of which 1,133 have been implemented. Alltel has approximately 62 PSAP requests for Phase I in progress with implementation scheduled for the agreed upon deployment date listed in the attached spreadsheets. Alltel has received 86 requests for Phase I service that have been determined to be non-bona fide requests, although Alltel continues to cooperatively work with these PSAPs in order to schedule activation in accordance with the prospective time frame for the PSAPs readiness.

## **B. Phase II**

To date Alltel has received a total of 777 Phase II requests. Of this number, 613 requests have been met and service has been cut-live, while approximately 106 requests are in progress with deployment scheduled for the agreed upon dates listed on the attached spreadsheets. Alltel has received 56 non-bona fide requests, and Alltel continues to work cooperatively with these PSAPs in order to schedule activation in accordance with the prospective time frame for the PSAPs' readiness.

## **C. General Condition**

As previously reported, technology issues for Alltel's multi-vendor network have largely been resolved and Alltel continues to work aggressively to resolve open issues on a PSAP-by-PSAP basis. Although some minor delays in Phase II service have occurred, Alltel has taken all the steps for deployment that are not dependent on PSAP readiness. Alltel has completed all hardware and software upgrades necessary in its own network and completed testing; accounted for all trunking between its system to the selective router and the ALI database; and established and maintained contact with the PSAPs to obtain any necessary information. Order on Reconsideration, FCC 02-318, ¶ 21 (rel. Nov. 26, 2002), codified at 47 C.F.R. § 20.18(j)(4)(vi). As discussed above, however, full end-to-end testing requires PSAP participation. Also, as discussed in previous reports (incorporated herein by reference) further refinements are necessary during the final deployment stages, as each PSAP's network and equipment is different. Alltel continues to arrive at mutually agreed upon launch dates with its PSAPs. *See* 47 C.F.R. § 20.18(j)(5). Nevertheless, in some markets there is a chance that Alltel will encounter unforeseen delays in implementation and, consequently, may need to seek specific and limited relief from deployment deadlines. Alltel's good faith efforts warrant Commission flexibility as Alltel works through the PSAP-specific issues that will arise during final end-to-end testing with PSAPs.<sup>4</sup>

Alltel would be pleased to provide the Commission with such additional information as the Commission may require.

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<sup>4</sup> As the Commission has acknowledged, an additional period of time is required between the time the PSAP becomes E-911 capable and the date of service launch. *See* 47 C.F.R. § 20.18(j)(4)(x) (affording certifying carriers 90 days to provide E911 service after the PSAP becomes capable).

**Declaration**

I have read the foregoing E-911 Thirteenth Quarterly Report of Alltel Communications, Inc. and declare under penalty of perjury that it is true and correct to the best of my information and belief. Executed November 1, 2005.

/s/

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Glenn S. Rabin  
Vice President  
Federal Communications Counsel  
ALLTEL Communications, Inc.  
601 Pennsylvania Ave.  
Suite 720  
Washington, DC 20004-2601

## **CERTIFICATE OF SERVICE**

I, Glenn S. Rabin, hereby certify that on the 1st day of November, 2005, I caused copies of the foregoing "Thirteenth Quarterly Report" to be sent to the following by first class mail, postage pre-paid, to the following:

Chief  
Enforcement Bureau  
Federal Communications Bureau  
445 12th Street, S.W., Room 7C-485  
Washington, D.C. 20554

Chief  
Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

John Newman  
Executive Director, APCO  
APCO International, Inc.  
World Headquarters  
351 N. Williamson Blvd.  
Daytona Beach, FL 32114

Jim Goerke  
Executive Director  
National Emergency Number Association  
4350 North Fairfax Drive  
Suite 750  
Arlington, VA 22203

James R. Hobson  
Counsel for NENA and NASNA  
Miller & Van Eaton  
1155 Connecticut Avenue, N.W.  
Washington, D.C. 20036

Evelyn Bailey  
President, NASNA  
State of Vermont Enhanced 911 Board  
94 State Street  
Drawer 20  
Montpelier, VT 05620

/s/ \_\_\_\_\_

Glenn S. Rabin